

# **EXHIBIT 16**

**ORIGINAL**

UUSI v. STIEG, ET AL

NORMAN RAUTIOLA

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Prepared by

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1   **A**    I don't know the names of Nartron employees in the plant. I  
2           may know of some of them, but I don't know their names.

3   **Q**    So individuals who were employed by Nartron were involved in  
4           the manufacture of the lids is what you're saying; is that  
5           correct?

6   **A**    Yes.

7   **Q**    Were their wages then paid by Nartron?

8   **A**    Yes.

9   **Q**    Do you have any idea how many individuals were manufacturing  
10          those -- involved in the manufacturing of the lids?

11   **A**    No.

12   **Q**    And when I say "manufacture," I'm talking about the actual  
13          physical creation of those items. Is that --

14   **A**    Yes; I understand that.

15   **Q**    In 2016 were any Tattler Home Products -- individuals  
16          employed by Tattler Home Products manufacturing those lids?

17   **A**    No.

18   **Q**    And were those Nartron employees again?

19   **A**    Nartron employees would be operating the molding machines  
20          and would perform the packaging and shipping operations.

21   **Q**    All right. Did Nartron file any tax returns that indicated  
22          that Nartron was involved in the manufacture or shipping of  
23          the lids?

24   **A**    I would have to examine the tax returns to determine exactly  
25          how that was filed.

1 listed here that may have an interest in the production of  
2 the canning lids that you've identified that are being  
3 manufactured by Nartron employees?

4 **A I don't think so.**

5 **Q** Is there a way for you to check to see if that's true?

6 **A I just did. I reviewed my frontal cortex and cerebrum and**  
7 **the answer came no.**

8 **Q** All right.

9 MR. WOTILA: I'll take a minute to review some  
10 documents. I don't think I'll have to go over these with  
11 Mr. Rautiola at this time, but let me see if there's  
12 anything else. This will take two or three minutes.

13 MR. KOSTOPOULOS: That's fine.

14 (Off the record)

15 **Q** Regarding the production of the canning lids at the  
16 facility, are you still using the original equipment that  
17 was delivered from Colorado?

18 **A Yes.**

19 **Q** Has it been modified in any way?

20 **A I don't think so, but I don't know that.**

21 **Q** All right. Who would know whether it's been modified?

22 **A I would typically know that.**

23 **Q** Okay. And you don't know --

24 **A But since I don't know everything that's going on out there**  
25 **with the mold operator and on and on and on, but in the**

1       normal course of business I would know that.

2       Q     And as of this date you have not been informed in your  
3       normal course of business of any modifications to that mold?

4       A     Now, you've specified to the mold. The answer is, yes,  
5       there have been no changes to the mold to the best of my  
6       ability, nor to any other equipment that was delivered to us  
7       from S&S in Colorado.

8       Q     All right. So basically the mold that's being used to  
9       produce the lids is the same condition, if you will, other  
10      than perhaps some wear and tear, now that it was when it was  
11      delivered from Colorado?

12      A     Yes.

13      Q     Does Edward Cox work for any of your business entities,  
14      including Nartron?

15      A     Yes.

16      Q     Is he still employed there?

17      A     Yes.

18      Q     Does David Shank still work for any of your entities?

19      A     Yes.

20      Q     And he's still employed there?

21      A     Yes.

22      Q     Again, looking at what's been marked as Exhibit 16, which is  
23      the U.S. Patent Application Publication, who would  
24      physically prepare these 16 pages for the application, if  
25      you know?